

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ANACOR PHARMACEUTICALS, LLC)
and PF PRISM IMB B.V.,)

Plaintiffs,)

v.)

DR. REDDYS LABORATORIES, LTD.,)
et al.)

Defendants.)

C.A. No. 21-1348 (CFC) (JLH)
CONSOLIDATED

**NOTICE OF DEPOSITION OF DEFENDANTS TEVA PHARMACEUTICALS
DEVELOPMENT, INC. AND TEVA PHARMACEUTICALS USA, INC.
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs Anacor Pharmaceuticals, LLC and PF PRISM IMB B.V. (collectively, “Plaintiffs”), by their attorneys, White & Case LLP, will take the deposition upon oral examination under oath of Defendants Teva Pharmaceuticals Development, Inc. and Teva Pharmaceuticals USA, Inc. (collectively, “Teva”), beginning on June 7, 2023 at 9:30 a.m., at the offices of White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020, or at such other time and place to be agreed upon. If the deposition is not completed on the agreed-upon day, it will continue until completed with such adjournment as to time and place as may be necessary.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Teva shall designate one or more officers, directors, employees or other persons who will testify on its behalf regarding the matters listed in Schedule A attached hereto. The depositions will be taken before a qualified notary public or before some other officer authorized by law to administer oaths. The depositions will be recorded stenographically and by videotape.

The Definitions and Instructions set forth in Plaintiffs’ First Set of Requests for Production to Defendants Teva Pharmaceuticals Development, Inc. and Teva Pharmaceuticals USA, Inc. (Nos. 1-60), dated May 13, 2022 and Plaintiffs’ First Set of Interrogatories to Defendants Teva Pharmaceuticals Development, Inc. and Teva Pharmaceuticals USA, Inc. (Nos. 1-4), dated May 13, 2022, are incorporated herein by reference and include “Teva’s ANDA” which shall mean ANDA No. 215914 submitted to the FDA pursuant to 21 U.S.C. § 355(j)(2) and the “Teva Product” which shall mean the product that is the subject of Teva’s ANDA.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Megan E. Dellinger

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April 28, 2023

SCHEDULE A

1. The contents of Teva's ANDA, including any amendments or supplements to Teva's ANDA.
2. Teva's decision to prepare and file Teva's ANDA, and to develop and seek FDA approval to market the Teva Product.
3. Communications between Teva and the FDA concerning Teva's ANDA and/or the Teva Product.
4. The current status of Teva's ANDA.
5. Teva's understandings or expectations as to when the FDA will grant tentative or final approval to Teva's ANDA.
6. Teva's plans, projections, or expectations regarding when Teva will begin to market the Teva Product in the United States.
7. The research, development, design, formulation and manufacturing of the Teva Product, including any difficulties encountered during development of the Teva Product.
8. Whether Teva's Product is the chemical compound 5-(4-cyanophenoxy)-1,3-dihydro-1-hydroxy-[2,1]-benzoxaborole.
9. Any *in vivo* testing of the Teva Product, including any bioequivalence testing, other clinical testing, or any testing in animals.
10. Whether the Teva Product could be used or prescribed to treat a patient suffering from atopic dermatitis.
11. Information Teva relied upon to allege invalidity of the Patents-in-Suit in connection with Teva's Paragraph IV Notice.
12. Teva's analysis of the market for Eucrisa[®].

13. Actual or projected sales or market share for the Teva Product assuming FDA approval of Teva's ANDA.

14. Business plans, marketing plans, sales or market projections, market analyses, market share projections, pricing plans, pricing analyses, and sales plans for the Teva Product.

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on April 28, 2023, upon the following in the manner indicated:

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